

EXHIBIT 4

Hunters Capital, LLC v. City of Seattle

Chris Steel

Page 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
)	
Plaintiff,)	
)	
vs.)	No. 20-cv-00983
)	
CITY OF SEATTLE,)	
)	
Defendant.)	

VIDEOTAPED VIDEOCONFERENCE DEPOSITION
UPON ORAL EXAMINATION OF
CHRIS STEEL

Seattle, Washington

(All participants appeared via videoconference.)

DATE TAKEN: MARCH 9, 2022

REPORTED BY: CINDY M. KOCH, RPR, CRR, CCR #2357

BUELL REALTIME REPORTING, LLC
206.287.9066 | 800.846.6989

1 Q. But you said you were -- you were aware of a
2 lawsuit relating to CHOP; correct?

3 MR. CRAMER: Objection. Vague as to time.

4 A. I -- I mentioned that the City was being sued
5 because of CHOP. I said I wasn't familiar or did not
6 know what entities were doing it.

7 BY MR. REILLY-BATES:

8 Q. Okay. When -- when did you become aware that
9 some entities were suing the City over CHOP?

10 A. I honestly don't -- I can't answer the
11 question. I don't know when I became aware of it.

12 Q. Would it have been in 2020 or 2021, do you
13 think?

14 A. I really can't honestly answer that question
15 because I'm not sure.

16 Q. Okay. Can you tell me why the City did not set
17 up iCloud accounts for Apple users prior to August 2020?

18 MR. CRAMER: Objection. Form.

19 You can testify as to your personal knowledge.

20 A. My personal knowledge is that it was a -- it
21 was because of security concern -- concerns with iCloud.

22 BY MR. REILLY-BATES:

23 Q. And what -- what are those security concerns?

24 A. I don't know specifics on them. Just my --
25 my -- in some discussions I had, why we -- why -- why an

1 iCloud account wasn't being used or -- by the City,
2 was -- the feedback I'd received was due to security
3 issues with -- with the access.

4 Q. And can you tell me more about those
5 discussions? Who was involved?

6 A. It would have been with Seattle IT.

7 Q. Okay. And when -- when were those discussions?

8 A. I can't -- I can't put my finger on a
9 particular time. It would have been more so in the time
10 frame when we were switching to iPhones, to AT&T, so
11 that August of 2020 area.

12 Q. Who in Seattle IT were you talking to about
13 those issues?

14 A. His name is Edward Fattal.

15 Q. And why would it be okay for individual City
16 employees to set up their own iCloud accounts, but not
17 to have the City set up an iCloud account for the
18 individuals?

19 MR. CRAMER: Objection. Foundation. Calls
20 for speculation.

21 You can answer as to your personal knowledge.

22 A. I can't -- I can't answer. I don't know why,
23 other than the fact that you're talking about individual
24 user accounts, individuals having to maintain user
25 account information.

1 BY MR. REILLY-BATES:

2 Q. So you saw that as a problem, individuals
3 having to retain user account information, didn't you?

4 MR. CRAMER: Objection. Misstates
5 testimony.

6 A. It's an issue.

7 BY MR. REILLY-BATES:

8 Q. Why didn't you, Brian Kennedy, or anybody from
9 City IT take any actions to help save password
10 information for Seattle Police Department employee
11 users?

12 MR. CRAMER: You can answer as to your
13 personal knowledge, if you have any.

14 A. It's -- it's just not part of our process.
15 It's never -- we don't -- we don't maintain passwords of
16 other individuals.

17 BY MR. REILLY-BATES:

18 Q. Has that ever been something that you or your
19 colleagues have considered?

20 MR. CRAMER: Objection. Foundation.
21 You can testify as to your involvement.

22 A. No. Mainly for privacy and security issues.

23 BY MR. REILLY-BATES:

24 Q. What privacy and security issues were you
25 concerned about?

1 A. Having someone else's password.

2 Q. From 2017 through 2019, would you say it was
3 the routine practice of Seattle Police Department to
4 keep public records, including text messages?

5 MR. CRAMER: Objection. Foundation.

6 You can testify --

7 A. I can't --

8 MR. CRAMER: -- as to your personal
9 knowledge.

10 A. I can't answer that question.

11 BY MR. REILLY-BATES:

12 Q. Do you know whether it was Chief Best's habit
13 to preserve and keep text messages from 2017 through
14 2019?

15 MR. CRAMER: Objection. Calls for
16 speculation.

17 A. I have no -- no idea.

18 BY MR. REILLY-BATES:

19 Q. In your act- -- interactions with her, did you
20 ever have a chance to look at the text messages that she
21 had on her phone?

22 A. No. No reason to.

23 Q. Did -- did you have any -- help Chief Carmen
24 Best troubleshoot any IT issues in the time period from
25 June 2020 to her resignation in September of 2020?

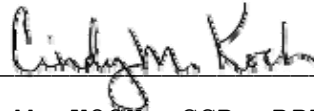
C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Cindy M. Koch, a Certified Court Reporter in
and for the State of Washington, do hereby certify that
the foregoing transcript of the deposition of Chris
Steel, having been duly sworn, on March 9, 2022, is true
and accurate to the best of my knowledge, skill and
ability.

IN WITNESS WHEREOF, I have hereunto set my hand
and seal this 15th day of March, 2022.



CINDY M. KOCH, CCR, RPR, CRR #2357



My commission expires:

JUNE 9, 2022



ERRATA


CASE NAME: Hunters Capital, LLC v. City of Seattle

DATE TAKEN: 3/9/2022

WITNESS: Chris Steel

CORRECTIONS

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Signature of Deponent



DECLARATION

CASE NAME: Hunters Capital, LLC v. City of Seattle

DATE TAKEN: 3/9/2022

WITNESS: Chris Steel

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page hereof.


Chris Steel

Signed on the 18 day of March, 2022.